

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

T-M VACUUM PRODUCTS, INC.,	§	
	§	
	§	
PLAINTIFFS	§	CIVIL ACTION NO. 09-00095
	§	
VS.	§	
	§	
JOHN B. BERRY and wife,	§	CIVIL
PATRICIA P. BERRY,	§	JURY
	§	
DEFENDANTS	§	

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

\_\_\_\_\_ Plaintiff T-M Vacuum Products, Inc. proposes the following questions for voir dire examination of the jury panel:

- \_\_\_\_\_ 1. The Plaintiff in this lawsuit is T-M Vacuum Products, Inc., a manufacturing company located in Cinnaminson, New Jersey. T-M Vacuum Products is owned by Fred Stuffer and his family. Does any member of the panel know of T-M Vacuum Products or Mr. and Mrs. Stuffer? If so, how do you know them?
2. T-M Vacuum Products is represented in this lawsuit by Miles Cohn, an attorney with the law firm of Sheiness, Scott, Grossman & Cohn. Does any member of the panel know Mr. Cohn or his firm? If so, how do you know them? And, is there anything about your experience with them that might affect your judgment in this lawsuit?
3. The Defendants in this lawsuit are John B. Berry and his wife, Patricia P. Berry. Mr. Berry owned TAISC, Inc., a company that did business under the name of "GlobaLease Solutions." Does any member of the panel know of the Berrys or GlobaLease Solutions? If so, how do you know them?
4. Mr. and Mrs. Berry are represented in this lawsuit by Michael Richardson, an attorney with the law firm of Beck, Redden & Sechrest, and by William Rucker. Previously, the Defendants were represented in this lawsuit by Tom Bousquet. Does any member of the panel know any of these attorneys? If so, how do you know

them? And, is there anything about your experience with them that might affect your judgment in this lawsuit?

5. Does any member of the panel work (or in the past worked) in a bank, mortgage company, or other business that makes loans? If so, what is or was your position, and for what company?
6. Does any member of the panel have a immediate family member that works or formerly worked in a bank, mortgage company, or other business that makes loans? If so, what is or was his or her position, and for what company?
7. Has any member of the panel been party to a lawsuit with a bank, mortgage company, or other business that makes loans? If so, please describe the dispute that gave rise to the lawsuit. Was the lawsuit settled, or did it go to trial?
8. Has any member of the panel been party to any other lawsuit involving a business or commercial dispute? If so, please describe the dispute that gave rise to the lawsuit. Was the lawsuit settled, or did it go to trial?
9. Has any member of the panel started his or her own business? If so, please describe the business.
10. Is any member of the panel familiar with “equipment leasing” as a form of financing or lending money? If so, how?

Respectfully submitted,

SHEINESS, SCOTT, GROSSMAN & COHN, L.L.P.

By: /s/ H. Miles Cohn

H. Miles Cohn  
Texas Bar No. 04509600  
Joshua A. Eberle  
Texas Bar No. 24062706  
1001 McKinney, Suite 1400  
Houston, Texas 77002-6420  
Facsimile: 713/374-7020  
Telephone: 713/374-7049

ATTORNEYS FOR PLAINTIFF,  
T-M VACUUM PRODUCTS, INC.

CERTIFICATE OF SERVICE

I certify that a true copy of Plaintiff's Proposed Voir Dire Questions was forwarded, by ECF electronic service, this the 22<sup>nd</sup> day of January, 2010, to Defendants' counsel.

Michael E. Richardson  
Beck, Redden & Seacrest  
One Houston Center  
1221 McKinney Street  
Suite 4500  
Houston, Texas 77010

William W. Rucker  
3355 West Alabama, Suite 825  
Houston, Texas 77098

/s/ H. Miles Cohn

H. Miles Cohn